



January 10th, 2006 (Via certified or express mail)

Mr. Kevin Turner-Environmental Scientist, OSC U. S. Environmental Protection Agency c/o Crab Orchard National Wildlife Refuge 8588 Rt. 148
Marion, IL 62959

Mr. Thomas Martin, Esq. Associate Regional Counsel 77 West Jackson Boulevard (C-14J) Chicago, IL 60604-3590

Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO) Sediment / Soils Removal Action Monthly Report; December 1 - December 31, 2005 Reporting Period

Dear Mr. Turner and Mr. Martin,

Enclosed is the Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") Sediment Removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting and covers the period from December 1 to December 31, 2005.

Sincerely,

Steven D. Smith Project Coordinator

cc: Nabil Fayoumi – USEPA Region 5

Sandra Bron - IEPA Mike Coffey - USFW

Richard Williams - Solutia

Cathleen Bumb - Solutia

Mayor Frank Bergman - Cahokia

Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)

Mayor R. Sauget - Sauget, IL

L. Glen Kurowski- Monsanto

Linda Tape - Husch & Eppenberger

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO - Dead Creek Sediment Removal Action

Status Report

Date of Report:

January 10, 2005

Period Covered:

December 1, 2005 – December 31, 2005

Work Performed During the Reporting Period

Groundwater Monitoring

• Revision 01 of the Draft Groundwater Monitoring Plan - submitted to the Agencies on August 3, 2001. Although it has not received Agency approval, it has been implemented.

TSCA Containment Cell

- The Operations and Maintenance Report submitted for the Agencies' review and approval on August 28, 2001- remain under review. Portions of the Plan applicable to the placement of sediments have already been approved.
- Performed inspections of the site.
- Inspected and maintained the 6oz. geotextile/6 mil scrim reinforced poly cover over the containment cell.
- Maintained stormwater and leachate collection controls around the containment cell
- Monitored support area facilities.
- Analytical results for the third quarter 2005 samples from the groundwater monitoring wells around the cell were received from the laboratory.
- Obtained fourth quarter 2005 groundwater samples form these wells.

Dead Creek

A final revised, excavation plan for Sectors B, D, and F in Dead Creek, was submitted to the Agency on October 28th. This work plan was approved on November 2nd, 2005.

An additional Work Plan was submitted on November 15^{th} proposing the excavation of mercury impacted soils in CS – F and the Borrow Pit Lake. Comments on the plan were received from the Agency on November 22^{nd} and responses to those comments were

submitted on December 1st and the plan was verbally approved by the Agency on December 5th. Written approval from the Agency was received on December 21st.

The contractor selected to carry out the soil excavation, PSC, began mobilizing to the site on November 7th and had completed mobilization by November 21st. By the end of the reporting period, the contractor had completed excavation in CS-B and had begun excavation in the northern portion of CS-D. The analytical results for the confirmation samples for most of the COPCs had been received and were below the relevant RBCs. However, the results from the dioxin analyses had still not been received by the end of December. It is estimated that approximately 2,500 cu. yd. of soil were removed from the creek bottom. Post excavation surveys will be conducted in CS-B during the first week of January to confirm the volume of soils removed.

During excavation in CS-B, an open pipe was observed in the east bank of the creek immediately below the top of the bank. A dark oily liquid discharge was observed from the pipe. The discharge had a strong petroleum odor and a less noticeable sewage odor. Based on discussion with the adjacent property owner, Metro Construction, the effluent from Metro Construction's sewage treatment system apparently discharges through this pipe. The discovery was reported to the Agency and a sample of the discharge was obtained at the Agency's request. The sample will be analyzed for VOCs, SVOCs and PCBs and it is expected that the results will be available early in January.

Excavation of the creek bottom soils is currently about 5 days behind the original project schedule because of bad weather (rain at the end of November and snow and freezing conditions in the early part of December). However, it is anticipated that the project will be able to make up these days and return to schedule.

Data Submittal

No data are submitted with this report.

Work Scheduled for Next Reporting Period

- Conduct routine inspection of the containment cell.
- Continue operation of the stormwater treatment system.
- Perform necessary operation and maintenance activities on the containment cell and temporary treatment system.
- Begin analyses on the fourth quarter 2005 samples from the monitoring wells around the containment cells.
- Complete creek bottom soil excavation in CS-D and CS-F and begin grading the creek bottom between the end of CS-E at Parks College and the upstream end of CS-C to promote drainage.
- Begin sediment excavation in the Borrow Pit Lake.
- Continue to fund the City of Cahokia's operation of the creek dewatering system.

PROJECT COMPLETION

| Mobilization | 100 % |
|----------------------------------------------|-------|
| Berm Construction | 100 % |
| Liner Installation | 100 % |
| Sediment Removal Preparation | 100 % |
| Sediment Excavation (Site M) | 100 % |
| Sediment Excavation (Original Scope of Work) | 100 % |
| Sediment Excavation (Sector F) | 100 % |
| Temporary Cover installation | 100 % |
| Demobilization - Phase I | 100 % |
| Final Cover Installation | 0 % |
| Demobilization - Phase II | 0 % |
| Final Report Preparation | 0 % |